



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 29, 2022

**BY CM/ECF**

The Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Enald Beqiraj, a/k/a "Aldo Beqiraj," 21 Cr. 656 (LGS)***

Dear Judge Schofield:

The Government writes jointly with defense counsel to request a 30-day adjournment of the pretrial conference in the above-referenced matter currently scheduled for May 2, 2022, at 10:45 a.m. The Government also seeks an exclusion of time under the Speedy Trial Act until the date of the next conference.

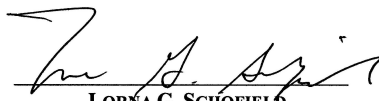
On March 24, 2021, the Government obtained a Complaint charging the defendant with two counts of wire fraud, in violation of 18 U.S.C. §§ 1343 and 2. On March 29, 2021, the defendant was arrested at his residence in Salem, Massachusetts. He was presented the next day and released subject to pretrial bail conditions. On April 20, 2021, the defendant as presented in this District and permitted to remain on release subject to the same conditions. On October 27, 2021, the defendant agreed to the filing of an Information and pleaded not guilty.

The parties have had ongoing, detailed discussions about mitigation and about appropriate pretrial resolutions to this matter. The parties believe they have reached an agreement in principle, and the Government intends to transmit a written plea offer to defense counsel within the next week. A 30-day adjournment will permit the Government to finalize this offer and give the defendant time to review it with his counsel.

The Government further requests, with the consent of defense counsel, an order excluding time under the Speedy Trial Act from May 2, 2022, until the date of the next conference in this matter. The ends of justice are served by excluding time because it will permit the parties additional time to complete their discussions regarding a pretrial resolution. *See* 18 U.S.C. § 3161(h)(7)(A).

Application Granted in part. The status conference scheduled for May 2, 2022, is adjourned to **May 31, 2022, at 10:15 a.m.** For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and May 31, 2022, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h) (7)(A). It is hereby ORDERED that the time between today and May 31, 2022, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 37.

Dated: May 2, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Defense counsel consents to the adjournment of the pretrial conference and the exclusion of time under the Speedy Trial Act.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York

/s/  
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Cc: Counsel for the defendant (by CM/ECF)